

THIS MATTER having been brought before the Court by Plaintiff City of Newark, through its counsel, by Order to Show Cause seeking a temporary restraining order and preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and L. Cv. R. 65.1, and upon the Verified Complaint, Certifications of Sha-Kira Jones (dated November 13, 2019), Natasha Allen (dated December 1, 2019), and SOTA Recipient 1 (dated November 14, 2019), and Brief submitted herewith, the Court having determined that

good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause being shown, it is on this _____, 2019, ORDERED, as follows:

1. That the above named defendants show cause before this Court, at room _____, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on _____, 2019, at _____ o'clock (am/pm), or as soon thereafter as counsel may be heard, why an order should not be issued enjoining the defendants during the pendency of this action as follows:
 - a. preliminarily enjoining and restraining the Defendants from any further implementation of the SOTA program in Newark, NJ;
 - b. requiring Defendants to provide an accounting to identify all persons and families relocated to Newark through the SOTA program, all landlords in Newark that participated in the SOTA program, all inspections of residences in Newark that were the subject of the SOTA program, all amounts paid to landlords in Newark through the SOTA program, and all persons who returned to New York City from Newark after participation in the SOTA program.
 - c. Imposing a constructive trust for the benefit of all participants in the SOTA program that wish to remain in Newark;
 - d. requiring Defendants to facilitate the relocation of any families or persons who participated in the SOTA program and who wish to return to New York City;

- e. Granting such other relief as the Court deems equitable and just.
2. Sufficient reason having been shown, pending the hearing of Plaintiff's application for a preliminary injunction, the Defendants are temporarily restrained and enjoined from any further implementation of the SOTA program in Newark, NJ.
3. A copy of this Order to Show Cause, Verified Complaint, supporting certifications, and Brief, shall be served upon the upon the defendants or their counsel within _____ days of the date hereof, in accordance with FRCP 4.
4. The Plaintiff must file with the Court its proof of service of the pleadings on the Defendants no later than three (3) days before the return date.
5. Defendants shall file and serve a written response to this Order to Show Cause and proof of service by _____, 2019. Defendants must send courtesy copies of their opposition papers directly to Judge _____, whose address is: _____, New Jersey _____.
6. The Plaintiff must file and serve any written reply to the Defendants' opposition to the Order to Show Cause by _____, 2019. A courtesy copy of the reply papers must be sent directly to the chambers of Judge _____.
7. If the Defendants do not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default.

8. The Court will notify the parties whether it will entertain argument on the return date of the Order to Show Cause.

United States District Judge